

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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RAMON ORTEZ, JR.

Plaintiff(s),

-against-

STERLING INFOSYSTEMS, INC. and
DOES 1-10 inclusive,

Defendant(s).

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

Case No. 1:25-cv-00389-OEM-VES

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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s): Devon Fok & Joshua Kim, DHF Law, 2304 Huntington Dr., Ste. 210, San Marino, CA 91108, 888-651-6411, devin@devinfoklaw.com

For Defendant(s): Howard Wexler & Esther Slater McDonald, Seyfarth Shaw, 620 Eighth Ave., New York, NY 10018, 212-218-3332, hwexler@seyfarth.com

A. Do the parties request referral to the Court's ADR program? Yes: ☐ No: ☒

B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?

Yes: ☐ If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.

No: ☒ If no, do not indicate which party declines consent.

C. The parties may wish to engage in settlement discussions.

If so, Plaintiff(s) will serve demand by . Defendant(s) will respond by

.D. Defendant(s) will answer or otherwise respond to complaint by 03/24/25 , if not yet done.

The parties will serve Rule 26(a)(1) initial disclosures by 05/13/25 , if not yet done.

The parties will serve initial document requests and interrogatories on or before 06/27/25 .

Any joinder and/or amendments of the pleadings must be made by 05/28/25 .

The parties will complete fact discovery by 10/27/25 .

If the parties perform expert discovery, they will serve initial disclosures by 12/11/25 ;
initial expert reports by 01/13/26 ; and rebuttal expert reports on or before 02/13/26 .
All discovery, including expert depositions, will be completed by 04/14/26 , and the parties
will file a joint letter certifying the close of all discovery by this same date.

Other considerations the parties wish to bring to the Court's attention, such as the need for
electronic discovery or confidentiality order:

The parties will propose an agreed-upon confidentiality order.